

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

JUAN OMAR ALVAREZ BERRIOS
AILYN YADIRA ROSARIO RESTO

Debtor(s)

Case No. **13-05014 MCF**

Chapter 13

MOTION TO AMEND SCHEDULES I, J, SOFA AND PLAN

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. Schedule I contained incorrect information about debtor's income, but after considering claims by Fondo del Seguro del Estado and potential claims by IRS and Departamento de Hacienda, debtors' budget was insufficient to pay these priorities. Debtor Alvarez works a 20 hours schedule per week at L & F Station in Ciales at a rate of \$7.25 per hour. After he followed our suggestions he succeeded having an increased to 30 hours a week and his income will be \$942.00 a week with deductions of \$74.97.
2. Schedule I was amended to reflect that increase in salary and the prorated Christmas Bonus of \$600.00 expected by Joint debtor every year (itemized in Other Income). Schedule J was amended for minor adjustments in expenses.
3. Statement of Financial Affairs was amended to include information of business that closed operations in January 2012 and plan was amended to increase base with payments in two steps: two months of \$170.00 and 58 months of \$310.00 during 60 months.

NOTICE

TAKE NOTICE that within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted or decided without actual hearing unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public

policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the informed above and confirm plan dated August 7, 2013.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of this motion has been filed with the Clerk of the Court that will send notice to the Chapter 13 trustee José R. Carrión Morales and all parties subscribed to the CM/ECF system. All other non participants have been notified on this date with a copy of the motion regular mail using the US Regular Postal Service, as per Master Address List attached.

In Vega Baja, Puerto Rico, this day August 8, 2013

s/ Juan O. Calderon Lithgow
JUAN O. CALDERON LITHGOW
ATTORNEY FOR DEBTOR, 205607
PO BOX 1710
VEGA BAJA, PR 00694-1710
TEL.: 787-858-5476
Email: caldlithlaw@gmail.com

JUAN OMAR ALVAREZ BERRIOS
HC-01 BOX 5301
CIALES, PR 00638

AILYN YADIRA ROSARIO RESTO
HC-01 BOX 5301
CIALES, PR 00638

JUAN O. CALDERON-LITHGOW
JUAN O. CALDERON-LITHGOW
P.O. BOX 1710
VEGA BAJA, P. 00694-1710

DEPTO. DE HACIENDA
SECC CERTIFICACION
BOX 4515, OFIC 405
SAN JUAN, PR 00936

FEDERAL LITIGATION DIV.
DEPT. OF JUSTICE
PO BOX 192
SAN JUAN, PR 00902

AMERICAN EXPRESS
PO BOX 3001
16 GENERAL WARREN BLVD
MALVERN, PA 19355

BANCO SANTANDER PR
PO BOX 362589
SAN JUAN, PR 00936

BANCO SANTANDER PR
PO BOX 362589
SAN JUAN, PR 00936

BANCO SANTANDER PR
PO BOX 362589
SAN JUAN, PR 00936

BANK OF AMERICA
PO BOX 982235
EL PASO, TX 79998

CHRYSLER FINANCIAL
PO BOX 195286
SAN JUAN, PR 00919-5286

CINGULAR
5407 ANDREWS HIGHWAY
MIDLAND, TX 79706

CINGULAR
5407 ANDREWS HIGHWAY
MIDLAND, TX 79706

DEPARTAMENTO HOVS135
PO BOX 47455
JACKSONVILLE, FL 32247

DEPTO. DE HACIENDA
SECC CERTIFICACION
BOX 4515, OFIC 405
SAN JUAN, PR 00936

DIRECT TV
PO BOX 71413
SAN JUAN, PR 00936-8513

DIVERSIFIED CONSULTANTS
PO BOX 551268
JACKSONVILLE, FL 32256-1268

ENHANCED REVOCERY
PO BOX 1259
DEP 98696
OAKS, PA 19456

EQUIPMENT DEPOT INC
PO NOC 296
NORWELL, MA 02061-0296

FIA CARD SERVICES
PO BOX 982236
EL PASO, TX 79998-2236

FIRST BANK
PO BOX 13817
SAN JUAN, PR 00908-3817

FIRST BANK
PO BOX 15019
WILMINGTON, DE 19886-5019

FIRST BANK PUERTO RICO
PO BOX 11865 FNDZ JUNCOS
SAN JUAN, PR 00910

FIRST BANK PUERTO RICO
PO BOX 11865 FNDZ JUNCOS
SAN JUAN, PR 00910

FIRST SOURCE
PO BOX 628
BUFFALO, NY 14240-0628

FONDO DEL SEGURO DEL ESTADO
GPO BOX 365028
SAN JUAN, PR 00936-5028

LEADING EDGE RECOV
5440 N CUMBERLAND AV
SUITE 300
CHICAGO, IL 60656-1490

LVNV FUNDING LLC
PO BOX 10497
GREENVILLE, SC 29603

MCS
PO BOX 9023547
SAN JUAN, PR 00902-3547

MCS
DPTO FINANZAS
PO BOX 193310
SAN JUAN, PR 00919-3310

NCO FINANCIAL SYSTEM INC.
PO BOX 192478
SAN JUAN, PR 00918

OPERATING PARTNERS CO INC
PO BOX 194499
SAN JUAN, PR 00919

ORIENTAL BANK AND TRUST
PO BOX 195115
SAN JUAN, PR 00915-5115

POPULAR AUTO
PO BOX 15011
SAN JUAN, PR 00902-8511

PR TELEPHONE
PO BOX 70239
SAN JUAN, PR 00936

SOUTHWEST CREDIT SYSTEM
4120 INT PARKWAY
SUITE 1100
CARROLLTON, TX 75007-1958